

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: BENICAR
(OLMESARTAN) PRODUCTS
LIABILITY LITIGATION**

MDL No. 2606

HON. ROBERT B. KUGLER

Civil No. 15-2606 (RBK)(JS)

NOTICE OF MOTION

TO: All Counsel and Parties

PLEASE TAKE NOTICE that on December 23, 2019 at 9:30 a.m., plaintiffs shall move before the Honorable Robert B. Kugler, U.S.D.J., at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order (1) providing that the common benefit law firms can be paid their common benefit awards upon payment of substantially all of the funds to be paid to plaintiffs/claimants, (2) correcting a typographical error in the CBC Final Recommendation regarding the amount awarded to Pearson, Randall & Schumacher, and (3) providing for escrow of the \$180,000 amount at issue on the currently pending appeal filed by Mark Cuker, Esq., to be disbursed upon resolution of the appeal.

PLEASE TAKE FURTHER NOTICE that plaintiffs shall rely upon the attached letter brief in support of the Motion.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: s/ Adam M. Slater

Dated: December 12, 2019

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: s/ Adam M. Slater

Dated: December 12, 2019